#### **BARCLAY DAMON LLP**

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# UNITED STATES BANKRUPTCY COURT SOTHERN DISTRICT OF NEW YORK

Chapter 11

In re:

ST. CHRISTOPHER'S, INC., et al,1

Case No. 24-22373(SHL) Main Case Jointly Administered

Debtors and Debtors-in-Possession.

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#### NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

**PLEASE TAKE NOTICE,** that the undersigned is appearing as counsel for St. Christopher's Inc. and the McQuade Foundation, jointly administered debtors and debtors-in-possession (the "Debtors") in the above captioned case.

Pursuant to 11 U.S.C. § 1109(b) and Rules 20002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned hereby demands that notice of all matters herein be served upon:

Allen J. Underwood II, Esq. BARCLAY DAMON LLP

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<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: St. Christopher's, Inc. (0485) and The McQuade Foundation (2652). The McQuade Foundation chapter 11, although presently jointly administered with the St. Christopher's Inc. Subchapter V Chapter 11, was originally filed under docket Number 24-22374(SHL).

**PLEASE TAKE FURTHER NOTICE,** that demand is also hereby made for service of copies of all papers, notices, reports, pleading, motions, applications, disclosure statements, plans, and answering or reply papers in this case and in contested matter.

**PLEASE TAKE FURTHER NOTICE,** that the undersigned hereby demands that the name and address set forth above be added to any service list in the case.

PLEASE TAKE FURTHER NOTICE, that this Notice of Appearance and Request for Service shall not be deemed or construed to be a waiver of rights of the Debtors to (i) have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) have the District Court withdraw the reference in any matters subject to such withdrawal, or (iv) any other rights, claims, setoffs, or recoupments to which Debtors may be entitled, which the Debtors expressly reserve.

Date: June 23, 2025 New York, New York **BARCLAY DAMON LLP** 

By: /s/ Allen J. Underwood II
Allen J. Underwood II, Esq.

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Counsel for Debtors and Debtors -in- Possession

## **CERTIFICATE OF SERVICE**

I certify that on June 23, 2025 I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of New York.

### BARCLAY DAMON LLP

Allen J. Underwood II, Esq. /s/Allen J. Underwood II